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August 5, 2020

VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
U. S. District Court for the Southern District of New York
Daniel Patrick Moynihan
500 Pearl St.
New York, NY 10007

**Re: *Cuturic v. The Jade Farm LLC et al*
Index No. 20 cv 3363**

Dear Judge Lehrburger:

We represent the Plaintiff in the above referenced matter. I am writing to the Court, with the consent of Defense counsel, to seek a short extension for filing the Proposed Civil Case Management Plan and Scheduling Order. Per your Honor's July 29, 2020 Order (Dkt. 24), the parties were instructed to file a Proposed Civil Case Management Plan and Scheduling Order no later than today, August 5, 2020. The parties had previously conferred regarding a management plan and scheduling order, but had not circulated this Court's specific individualized management plan and scheduling order form until this morning. Unfortunately, due to the effects of Hurricane Isaias, Defense counsel is currently without power or internet access and is unable to review the proposed plan. The parties intend to submit a proposed scheduling order as soon as Defense counsel gains power and internet access. I have conferred with Defense counsel, and the parties respectfully request a brief extension for filing the Proposed Civil Case Management Plan and Scheduling Order.

Respectfully submitted,

JOSEPH & KIRSCHENBAUM LLP

/s/ Michael DiGiulio
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